

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**



SMART PATH CONNECTIONS, LLC	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:22-cv-00296-JRG-RSP
	§	
NOKIA OF AMERICA CORPORATION,	§	
	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	

DEFENDANT NOKIA OF AMERICA CORPORATION’S AMENDED WITNESS LIST

Pursuant to this Court’s Fourth Amended Docket Control Order (Dkt. 207), Defendant Nokia of America Corporation submits this Amended Witness List for identification and categorization of trial witnesses.

At this time, Defendant discloses the following list of witnesses that it will or may call at trial to testify in person or by deposition designation. Defendant reserves the right to revise or supplement this list consistent with the Pretrial Order or as otherwise permitted by the Court. Furthermore, Defendant reserves the right to call additional witnesses live or by deposition designations (or to offer additional deposition designations from witnesses identified herein) in rebuttal to issues raised in Smart Path’s presentations. Defendant further reserves the right to call additional witnesses live or by deposition designation to respond to issues raised after the preparation and submission of this list, including any changes by Smart Path to its arguments, witness lists, or other positions. Defendant further reserves the right to call any witness live or by deposition designations for purposes of impeachment. Defendant further reserves the right to call additional witnesses live or by deposition designations (or to offer additional deposition

designations from witnesses identified herein) to the extent necessary to provide foundational testimony if Smart Path contests the authenticity or admissibility of any materials to be offered as evidence at trial. Defendant further reserves the right to substitute witnesses for the listed witnesses should any listed witness become unavailable for trial. Defendant further reserves the right to use any deposition designations identified by Smart Path as either affirmative designations or as counter-designations. Defendant further reserves the right to call any witness listed by Smart Path on its witness list or initial disclosures (as noted below), or who otherwise appears for Smart Path at trial.

Defendant reserves the right to supplement or amend the list in light of any Court order or any information submitted by Smart Path. Defendant may call as a witness any person identified on the witness list submitted by Smart Path. Defendant also reserves the right to offer additional testimony from rebuttal witnesses.

At this time, Defendant identifies the following witnesses for trial, who may be called live and/or by deposition:

	Witness ¹	(A) Will Call Live	(B) May Call Live	(C) May Call by Deposition
1	Sandeep Chatterjee	X		
2	Kevin Jeffay	X		
3	Melissa Bennis	X		
4	Thomas Brooks		X	X
5	Mustapha Aissaoui		X	X
6	Alfred Nothhaft		X	X
7	Philippe Bergeon		X	X
8	Dhiren Patel		X	X
9	Jeff Valley	X		
10	Jeff Jakab		X	X
11	Herve Patrick Desveaux		X	X
12	Yehuda Binder		X	X
13	Richard Allison		X	X
14	Izhak Tamir		X	X
15	Ricardo Valerdi		X	
16	Eric Cole		X	
17	Stephen Dell		X	
18	Jeremy Pitcock		X	X
19	Any Other Witness Included on Smart Path's Witness List ²		X	X

DATED: February 9, 2024

Respectfully submitted,

/s/ David S. Frist

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¹ To the extent that a witness is not available to offer live testimony, Defendant may present deposition testimony for each such witness.

² Defendant has designated any Smart Path witness as “may call live” in the event that Smart Path does not call any of its witnesses live at trial or attempts to limit the scope of cross-examination to subject matter elicited during direct examination.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served via electronic mail on February 9, 2024, to all counsel of record.

/s/ David S. Frist

David S. Frist